

State of Georgia

County of Fulton

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**Fourth Declaration of Larry D. Reid Made
Pursuant to 28 U.S.C. § 1746**

Larry D. Reid, having been duly cautioned, does testify and depose, under penalty of perjury under the laws of the United States, as follows:

1. My name is Larry D. Reid, and I am an adult competent to give testimony in a court of law. The information set forth in this Declaration is based upon my personal knowledge.

2. I am one of the Plaintiffs in the action styled Larry D. Reid, et al. v. Darryl Moore, which is Case Number 1:21-cv-00991 upon the Docket of that Court (“this case”).

3. On December 19, 2021, I signed the Settlement Agreement in this case. I understood that the parties were to abide by the terms of the Settlement Agreement no later than 5 p.m. EST on December 20, 2021, and I complied with those requirements.

4. I have personally observed that Defendant Moore failed, after the Settlement Agreement deadline just mentioned, to take down multiple specified videos relating to me from YouTube and from other locations on the web. In December 2021, I moved the Court for an Order compelling him to abide by the terms of the Settlement Agreement, which the Court granted in an Order (ECF No. 33) entered on January 12, 2022.

5. Moore has continued to post content relating to me online despite that Order. He has done so on many occasions, some of which are detailed in the Memorandum in Support of my Second Motion to Enforce Settlement Agreement and for an Order Compelling Moore to Show Cause Why He Should Not Be Held in Contempt. I have viewed each of the instances of content relating to me described and linked to in that Memorandum, and based on my own personal knowledge, I declare and testify that the descriptions therein are accurate.

6. In videos posted on his YouTube account prior to the commencement of this case, Moore referred to me by various derisive nicknames, which would be familiar to those who have followed his channel. One of those nicknames was “Dr. Dingleberry.”

7. In content posted online prior to the commencement of this case, Moore sometimes posted—along with false or defamatory statements about me—the hashtag #endchildmolestation, or some variant thereof. This would be familiar to those who have followed him online, alludes to me, and associate me with that hashtag to Moore’s online audience.

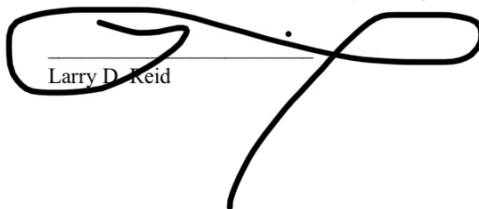
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8. I was born on February 13, 1978.

9. In videos posted in the past, now taken down pursuant to the Settlement Agreement, Moore alleged that a man named Jimmy Battles was a victim of sexual abuse or child molestation in the context of defaming me.

FURTHER DECLARANT SAYETH NAUGHT

The undersigned, Larry D. Reid, declares under penalty of perjury under the laws of the United States and pursuant to 28 U.S.C. § 1746 that the foregoing is true to the best of his personal knowledge, in witness whereof he has signed this Declaration below, at Fulton County, Georgia on the 21st Day of April 2022.



Larry D. Reid